

Item 1 - Cover Page

ENRICH FINANCIAL PARTNERS LLC

FORM ADV – PART 2A INFORMATION

April 24, 2015

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This Brochure provides information about the qualifications and business practices of EnRich Financial Partners LLC (“EnRich”). If you have any questions about the contents of this Brochure, please contact us at (608) 275-3442. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Additional information about EnRich (CRD No. 11234), including a copy of its Form ADV Part 1, is available on the SEC’s website at www.adviserinfo.sec.gov.

EnRich is a registered investment adviser. Registration of an investment adviser does not imply any certain level of skill or training.

Item 2 - Material Changes To This Brochure Since Its Last Annual Update filed March 31, 2015

Future material changes will be noted under this Item 2.

Item 3

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Item 4 - Advisory Business

EnRich Financial Partners LLC ("EnRich") is an investment adviser registered with the various state jurisdictions, which makes financial consulting and analysis, portfolio management, financial coaching, and manager search and monitoring services available to a wide variety of clients. EnRich has been in business since 2003. EnRich is owned by Elaine Beckett Rich and Christopher D. Rich. EnRich is not under common control with any other firm, nor does it control any other firm. Its only business is to provide investment advice.

EnRich also offers a wrap fee service which is described in a separate Form ADV, Part 2A "Wrap Fee" Appendix I Brochure. Accounts in the wrap fee program are charged one fee for both advisory services and certain transaction commissions. As sponsor of the wrap fee program, EnRich receives part of the wrap fee for its advisory services.

Partnership Advisory Services

Partnership Advisory Services include: "Strategic Partnership Services," which are financial planning and investment consulting in nature; "Portfolio Management Services," which include investment management; and "Full Partnership Services," which are a combination of Strategic Partnership Services and Portfolio Management Services. Clients may choose the level of services to be provided by EnRich through the Partnership Advisory Services Agreement.

All services start with an EnRich Representative obtaining client information and determining which services will best suit client needs and objectives.

Portfolio Management Services allow clients to maintain an account consisting of mutual funds and other equity and debt securities. EnRich may also recommend exchange-traded funds ("ETF"), when suitable for the client. ETF shares are bought and sold at market price, unlike mutual funds. ETFs are subject to risks similar to those of stocks. EnRich suggests clients invest at least \$250,000 in assets to open and maintain the Portfolio Management Service account. EnRich may accept accounts with less than \$250,000 in assets, however, if EnRich believes that, based on information provided by the client to the EnRich Representative, investing a lower amount is appropriate for the client. An account may be opened by a deposit of either cash or securities. When opening an account, the Representative will obtain financial data from the client and assist the client in determining investment objectives and restrictions. The Representative will regularly monitor the account and make investment strategy recommendations based on the specific needs and investment goals of the client. To accomplish this strategy, EnRich Representatives have discretionary authority to purchase and sell securities of their choice and in the amounts and at the times they believe it is suitable for the client's account to do so.

Portfolio Management Services are provided by EnRich Representatives only. No third party manager participates in this program.

Portfolio Management Services generally include the following: 1) Establishment of investment objectives, consistent with the client's risk tolerance, financial needs and goals; 2) Establishment of asset allocation mix based on the client's financial position, cash flow, risk preferences and time horizon; 3) Set up of accounts; 4) Transfer of assets to a custodian; 5) Implementation of all trades and account management; 6) Preparation of quarterly performance reports on all accounts; and 7) Periodic review meetings to update the client's ongoing financial planning and investment progress. In some cases,

EnRich may contract with third parties to provide certain reports or use those provided by the mutual funds and other securities. Clients are free to contact their account Representative at any time.

In no event will EnRich accept or maintain custody of any client funds or securities, other than checks payable to the account custodian, which are sent to the custodian when received. All accounts are maintained by a separate custodian.

EnRich does not assure or guarantee the results of any of its recommendations: losses can occur from following EnRich's advice pertaining to any investment or investment approach, even when using conservative investment strategies.

Commissions are charged for transactions by the brokerage firm processing the transactions. (Note that "wrap" account services (having asset-based fees covering both advisory services and certain transaction charges) are available from EnRich and described in EnRich's Form ADV Part 2A, Appendix 1 brochure.)

As of March 23, 2015, EnRich counsels client accounts with an estimated total of \$126,836,000 of assets managed on a discretionary basis and \$26,000 on a non-discretionary basis. In addition, EnRich counsels on estimated \$95,000,000 of non-managed assets.

Strategic Partnership Services can include any combination of the following topics, as agreed on between EnRich and the client:

- Investment Consulting - is an analysis of current investments and expected new ownership or sale of investments and recommendations of an investment allocation designed to meet the client's goals.
- Retirement Funding and Income Analysis - is an analysis of retirement needs of the client. EnRich reviews existing designated retirement accounts. We estimate the retirement income and expenses at various ages, establish savings, investment and investment budgets designed to meet retirement goals.
- Education Funding Analysis - is an analysis of the projected amount needed to fund education of children or grandchildren. We establish savings and investment budgets designed to meet funding goals.
- Life Insurance Needs Analysis - is an analysis to determine recommended coverage amounts and benefits and costs of existing policies. We recommend changes as necessary in policy coverage over time to meet the client's financial needs.
- Disability Insurance Needs Analysis - is an analysis to review existing or proposed disability insurance coverage with the client in relation to the client's expected wage and income needs during disability. We assist with locating an insurer if necessary.

Financial Coaching Services are designed to assist the client in making financial decisions and achieving peace of mind. The scope of the engagement is defined individually based upon client needs. This service may or may not include a written analysis, and may not be comprehensive. "Specific Analysis" entails performing a specific analysis of individual assets such as stocks, bonds, mutual funds, annuities, life insurance and health insurance policies. The service may also include assisting employers and/or employees in providing advice on the types of investment plans and the selection of various types of investments within a plan. Advice may also be provided concerning the management of death proceeds from life insurance policies and the distribution from profit sharing plans and/or retirement plans or any other analysis requested by the client.

All advice provided by EnRich and its Representatives is based upon the reliability of the information provided to EnRich by the client. Clients may contact their account Representative at any time.

Retirement Plan Management and Consulting Services

EnRich can provide the following services to Retirement Plan Accounts:

ERISA Section 3(38) plan advisory services – These services include EnRich performing discretionary investment management and consulting services as described below:

(a) EnRich will consult with the plan fiduciary (or an authorized Representative thereof), develop an investment policy statement ("IPS") for the plan that addresses the selection, monitoring, and replacement of the plan's investment options. The IPS will set forth the number of general asset class categories to be offered to plan participants with a goal of providing a menu of investments that will allow for the creation of well-diversified portfolios designed to provide for long-term appreciation and capital preservation through a mix of equity and fixed income exposures. EnRich shall be solely responsible for the preparation of the IPS, the selection of the investment options based on the available investments offered under the platform selected by the client, and, if the plan is subject to ERISA, the qualified default investment alternative for the plan.

(b) EnRich will review the investment options available through the plan and will notify the plan's recordkeeper as to EnRich's instructions to add, remove and/or replace specific investment options to be offered to plan participants that meet the criteria set forth in the IPS. EnRich will monitor the investment options and, on a regular basis, provide reports to the plan fiduciary (or the authorized Representative thereof) and instructions to the plan's recordkeeper to remove and/or replace investment that no longer meet the IPS criteria. If the plan is subject to ERISA, EnRich shall, when removing funds, attempt to select or identify replacement funds with similar risk and return characteristics as the removed funds.

(c) EnRich will retain final decision-making authority with respect to removing and/or replacing investments in the core lineup, and neither the client nor the plan fiduciary will have any responsibility to communicate instructions to any third-party, including the plan's recordkeeper, custodian and/or third-party administrator. EnRich shall not be responsible for any notices or other communications to the plan participants that may be required under ERISA, the Internal Revenue Code of 1986, as amended or other applicable law, but shall make its best efforts to provide client with sufficient advance notice of changes to the plan's investment options to enable client to comply with any applicable participant level fee disclosure requirements.

(d) EnRich shall also provide the following investment management services:

Ongoing Investment Review and Manager Selection - Reviewing the fund options selected by periodically comparing them to appropriate peer group indices; reviewing the capital markets environment; performing fund style analysis; analyzing funds for retention and/or termination; performing fund searches to replace options or to offer additional options; making such fund changes as it deems necessary or advisable.

Provision of Model Portfolios - EnRich may provide model portfolios comprised of diverse group of asset-class specific, no-load mutual funds and exchange-traded funds as investment options within the plan. EnRich will act as investment manager to those portfolios by selecting the specific funds to be included in each model. Plan participants can select a model portfolio or construct their own portfolio of funds from the funds otherwise available to them (or from other investment, if the client and the plan permit participants to use a brokerage window). Plan participants who select a model portfolio will own shares of each fund included in the model, in the proportion recommended in the model as of the initial date of investment. EnRich shall select, monitor, and change funds included in the model portfolios offered to plan participants from time to time as determined by EnRich in its sole discretion. EnRich shall, from time to time, direct the recordkeeper to rebalance account balances of plan participants to the extent necessary to comply with the current allocation of EnRich's model portfolios.

Ongoing Monitoring/Discretionary Services for Risk Based Model Portfolios - Taking discretion to manage, acquire, or dispose of funds in the model portfolios; taking discretion to change the portfolio allocations on an asset class or individual fund basis; reviewing the fund options selected in the model portfolios, as well as overall portfolio performance, and periodically comparing them to appropriate peer group and blended indices.

(e) EnRich will also provide the following ongoing Retirement Plan Consulting to Client as described below:

Trustee Consultation - Reviewing principles of successful investing and, to the extent the plan is subject to ERISA, reviewing ERISA guidelines and Section 404(c) compliance with client for participant directed plan requirements; evaluating the plan's current financial profile to aid in determining the appropriate asset allocation policy to match the risk tolerance and return objectives; and preparing allocation schedules necessary to determine the mix of desired investment options.

Provider Analysis - Reviewing performance and risk measures and administrative and investment-related fees for various investment options; performing an investment or administrative vendor search.

Implementation Assistance – Assisting with investment option/custodial applications, if requested.

Participant Education – Introducing employees to plan features, benefits, and costs and reviewing principles of successful investing, including market history and strategic asset allocation; summarizing investment options available to participants, and providing general asset allocation guidelines. EnRich intends to conform to Department of Labor (DOL) guidelines for initial and ongoing participant education meetings. EnRich does not intend to render individualized advice or advice regarding IRA rollovers under this Agreement and, therefore, will not be considered a fiduciary under ERISA at the participant level for investment advice.

Other Advisory Services – Summarizing total plan expenses on an annual basis; assisting client with plan participant communication pieces; working with the client to assist with plan objectives and goals (i.e., increase participation, reduce number of loans, etc.) and keeping up-to-date on industry trends and discussing with client.

Participant Education – Meeting annually with participants to review plan features, benefits, costs, and principles of successful investing, including market history and strategic asset allocation; summarizing investment options available to participants, and providing general asset allocation guidelines. EnRich intends to conform to Department of Labor (DOL) guidelines for initial and ongoing participant education meetings. EnRich does not intend to render individualized advice or advice regarding IRA rollovers under the agreement and, therefore, will not be considered a fiduciary under ERISA at the participant level for investment advice.

Investment Manager Search and Monitoring Services

In those instances where a client may benefit from receiving portfolio management services from an investment management firm other than EnRich, EnRich can provide its Manager Search and Monitoring Service.

Manager Search and Monitoring Services begin by EnRich identifying the client's investment objectives, restrictions and manager selection criteria. EnRich then presents one or more investment management firms which EnRich believes can satisfy the client's investment objectives and restrictions and which will enter into an investment management agreement with the client. Generally, clients only have contact with their EnRich account manager when selecting a manager and periodically determining the performance of the manager.

EnRich uses manager background information prepared by the investment managers being evaluated or by other firm's sponsoring manager search programs. It does not conduct its own research. Generally, management firms have agreed to accept accounts of less than \$500,000 and stand ready to provide management services to a client provided the client's account size and other conditions meet the minimum standards established by the manager and further provided that the client's investment objectives are consistent with the manager's investment philosophy. To facilitate account reporting, account assets are usually custodied at a firm designated by the third party manager which is often the brokerage firm sponsoring the manager search program. They will also generally require a client to have all securities transactions for the client's account processed by the client's account custodian.

Once a client has selected a manager from those presented, EnRich supplies the manager and/or program sponsor with information regarding the financial background and investment objectives of the client to the extent such information is provided by the client. The client then enters into an advisory agreement with the manager, or manager search program sponsor, whereby the manager agrees to accept and manage the client's account on a discretionary basis in accordance with the objectives of the client. EnRich provides periodic assistance in evaluating manager performance and, if necessary, recommendations to replace the selected manager. To the extent EnRich becomes aware of changes in a client's financial circumstances or objectives, this information is relayed to the client's manager. Updated financial information about a client is not collected by EnRich on a regular basis or given to a manager unless EnRich is made aware of changes by the client. Clients may communicate such changes to the client's manager or the program sponsor at any time.

EnRich's Representative will meet periodically with the client to review the selected manager's performance. EnRich generally does not recommend the replacement of a manager based on short-term performance results. In the event there is a significant change in the manager's investment philosophy, loss of significant investment management personnel or a change in ownership, EnRich will re-evaluate the manager to determine whether the manager has changed from how the manager represented itself initially and then determine whether to recommend a change to the client. Clients are free to contact their account Representative at any time.

Each client grants the manager complete and unlimited discretionary trading authority so the manager can place transaction orders at will for a client's account. Each client also grants authority to EnRich to transfer investments and funds to custodians used by third party managers in the amounts and at the times it deems it appropriate to do so. Each client has the opportunity to instruct the manager with respect to investment restrictions imposed on the management of the client's account. There is no restriction on a client contacting the manager directly for other purposes. Each client account with a manager is managed individually and is separate from the accounts of other clients of the manager. Each client receives confirmations of each securities transaction placed by the manager for the client's account, periodic custodial account statements, as well as a summary of account performance at least quarterly.

EnRich's Representatives retain discretion to transfer amounts between client accounts managed by EnRich and accounts managed by outside investment managers.

It is important to note that even though certain managers may have provided higher return results than other managers, they may not be presented to a client by EnRich due to the influence of other factors, including the nature of a portfolio manager's investment style and time under which securities were managed to produce returns.

Item 5 - Fees and Compensation

Fees paid to EnRich are for EnRich advisory services only and are negotiable. The fees do not include, for example, the fees charged by third parties such as third-party managers, or accountants and attorneys assisting with providing the client with accounting and legal advice. Commissions on transactions and other account fees will also be charged to the account by brokerage firms in accordance with the account's brokerage firm's normal commission schedule. See Item 12, Brokerage Practices. Customary commissions on insurance are also not included.

The firm also offers a "wrap fee" management program (described in a separate Form ADV, Part 2A "Wrap Fee" Appendix I Brochure), which involves the payment of one asset-based fee covering EnRich's fee and certain transaction commissions.

Prospective clients should be aware that in addition to EnRich's advisory fees, each mutual fund in which a client's assets are invested also pays its own advisory fees and other internal expenses which already have been deducted from the fund's reported performance. Depending on the fund, a client may be able to invest directly in the shares issued by the fund with or without incurring any sales or third-party management fees. Account maintenance fees, if any, are also deducted by the custodian.

When EnRich purchases mutual fund shares for clients, it may sometimes have a choice between two fund share classes of the same fund (or shares of otherwise identical funds), with differing internal expense rates. Purchasing the class with a lower internal expense rate ("Institutional Shares") will cause

EnRich to incur an asset-based pricing (ABP) fee. EnRich typically absorbs the ABP fee rather than passing it through to the clients. Purchasing the asset class with a higher internal expense rate ("Retail Shares") will not cause EnRich to incur an ABP; however, because the internal fund expenses are higher, the returns on a client's investment are slightly lower. Also, the ABP charged on the Institutional Shares is reduced by agreement with certain brokers, based on the amount of Retail Shares purchased by EnRich for its clients. This may create a conflict of interest.

When selecting between Institutional Shares (which incur an ABP) and Retail Shares (which do not incur an ABP), EnRich exercises discretion in selecting the class to be purchased within a client account based on a suitability analysis, and the selection may be negotiable with the client. EnRich takes into account the scope of the client relationship, the overall expected profitability of the account, the overall negotiated pricing relationship with the brokerage firm processing the trades, as well as the timing and expected frequency of rebalancing of the account. As a general rule, EnRich purchases Retail Shares for accounts worth less than \$500,000, and Institutional Shares for accounts worth \$2 million or greater. For accounts equal to or greater than \$500,000, but less than \$2 million, the allocation is generally a blend of Retail and Institutional Shares, with such blended allocation being negotiable by the client. Accounts are reviewed during the third quarter of each year, to determine whether the share classes held should be rebalanced or converted. However, accounts opened prior to March 31, 2015, that hold Institutional Shares will not be converted or rebalanced in a manner that would cause them to convert Institutional Shares into Retail Shares.

In addition, there are tax effects pertaining to fund share redemptions, and other sales, made by EnRich on behalf of clients. Redemptions and sales are taxable events which may accelerate the recognition of capital gains, and losses, and frequent redemptions and sales may result in short-term, rather than long-term, capital gains and losses.

Partnership Advisory Services Fees

Full Partnership and Portfolio Management Services - Rates for Full Partnership and Portfolio Management Services are based on an asset-based fee which declines as the total value of assets under management increases. The fee shall cover EnRich's fee and commissions for transactions except for: commissions for transactions placed by a third-party manager; mark-ups and mark-downs on principal trades; commissions for transactions ordered by the client; and commissions on transactions occurring after notice of termination of the agreement is given. The initial fee for new accounts is based on the value of securities or cash deposited and prorated for the previous quarter to the start date. Subsequent fee payments are due and will be assessed at the beginning of each quarter based on the value of the account assets (securities, cash and cash equivalents) under management as of the close of business on the last business day of the preceding quarter as valued by an independent pricing service, where available, or otherwise in good faith. Additional deposits of cash and/or securities will be subject to the same billing procedures.

If assets are deposited after the inception of a quarter, the advisory fee payable with respect to such assets will be prorated based on the number of days remaining in the quarter and charged at quarter-end.

An account includes investments held under the same registration (Joint, Individual, Custodial, Trust, IRA). An aggregate account is a total consolidation of all the different registrations (Joint,

Individual, Custodial, Trust, IRA) within a family through the same Portfolio Management Service which follows the Fee Schedule below.

<u>Market Value of Client Assets Under Management On Billing Date</u>	<u>Negotiated Annual Fee</u>
First \$500,000	1.10%
Next \$500,000	0.80%
Next \$4,000,000	0.60%
Next \$5,000,000	0.40%
Next \$10,000,000	0.30%
Amounts over \$20,000,000	0.25%

Clients receiving Portfolio Management Services are mailed advance notice that the advisory fee will be deducted from their account. Clients authorize EnRich to deduct all fees and transaction charges from client's account and such fees and charges are noted on client's statements or confirmations. EnRich has discretion to select securities to be sold to cover the fees.

Strategic Partnership Services - The fee for this service is negotiable and is based on the anticipated complexity and amount of work involved to complete the analysis. An annual fee quote is provided in advance and fees are payable quarterly in advance. Quarterly fees are not refundable. If a client chooses to terminate within a quarter, no fees will be refunded.

Coaching Services - Fees are \$300 per hour or a negotiated flat project fee depending on the anticipated complexity of the analysis and the anticipated amount of work that will be involved to complete an analysis or to provide the coaching. The hourly rate is established with the client prior to rendering the service. A six-hour minimum is preferred.

Strategic Partnership and Coaching Services may be terminated by written notice to EnRich. EnRich will determine the number of hours spent performing the service prior to receiving the written termination notice from the client. Those hours will be billed at the predetermined hourly rate. The client will be responsible for any amount earned by EnRich but not paid to the date of termination. Under certain circumstances, fees for Coaching Services and Strategic Partnership Services may be waived by EnRich in its sole discretion.

Retirement Plan Management and Consulting Service Fees

For Retirement Plan Consulting Services, EnRich charges a quarterly fee and will bill clients, in advance, based on the following fee schedule:

<u>Market Value of Client Account</u>	<u>Annual Fee*</u>
First \$500,000	1.10%
Next \$500,000	0.80%
Next \$4,000,000	0.60%
Next \$5,000,000	0.40%
Next \$10,000,000	0.30%
Amounts over \$20,000,000	0.25%

* This fee may be negotiated.

In some cases, EnRich may instead charge a negotiable flat rate.

Fees due EnRich shall be paid quarterly in advance. The initial fee is based on the value of the Account as of the portfolio start date and prorated for any partial calendar quarter. Subsequent fee payments are due at the beginning of each quarter based on the value of the Account as of the close of business on the last business day of the preceding quarter.

The agreement for services may be terminated by 30 days advance written notice. Upon termination, any prepaid fee is prorated and returned to the client.

Investment Manager Search and Monitoring Service Fees

Fees for Manager Selection and Monitoring Services are negotiable, payable quarterly in advance, and vary based upon the value of assets under management. These fees may also be included within the fees charged for Portfolio Management Services. EnRich's annual asset-based fees usually range from 0.50% - 1.50% of the assets under management and cover EnRich's fee only, not manager, transaction charges or custodial fees. Upon contract termination, all unearned prepaid fees are returned to the client. Clients usually authorize both the manager and EnRich to debit the client's account for the amount of fees due them. Clients should carefully consider total costs under the program since they may be higher or lower than comparable available services.

Fees previously paid will be refunded on a prorated basis to the date when the termination becomes effective, which is 30 days after receipt of the written termination notice, except in the State of Michigan, where the termination notice becomes effective 5 days after receipt.

Other Compensation

EnRich Representatives may also be licensed to offer insurance products and will receive customary commissions for the sale of such products should a client decide to make purchases through the Representative. Clients are free to purchase such products other than through the Representative. This compensation creates a conflict of interest. All prospective and existing clients are hereby advised that this conflict exists. The representative manages this conflict by ensuring that, in all cases, the investments made are suitable. Advisory fees are not reduced by the amount of sales compensation a Representative receives on insurance sales.

EnRich may sponsor social and educational events for clients, the expenses of which may be paid, in whole or part, by firms whose products and services are recommended to clients by EnRich portfolio managers. The firms absorbing such expenses may include mutual fund companies whose shares are recommended, attorneys whose services are recommended, brokerage firms through which client account transactions are processed, and other firms with a financial connection to EnRich. Additionally, these firms may pay for EnRich's expenses to attend meetings or conferences sponsored by the mutual fund or third party professionals providing services to clients. These expense reimbursements may create a conflict of interest for EnRich and its managers because they would be inclined to continue to recommend the products and services of these providers due to the financial support provided to EnRich by them.

Item 6 - Performance Based Fees and Side-by-Side Management

EnRich does not charge any performance-based fees. All fees are disclosed above.

Item 7 - Types of Clients/Minimum Account Size

EnRich makes its advisory services available to a wide variety of clients including, but not limited to, individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

For portfolios supervised on a continuous, discretionary basis, EnRich generally imposes an initial minimum asset value of \$250,000. However, the minimum can be waived by EnRich depending upon the type of account, kind of securities in the account, the dollar value of such securities, the projected nature of trading and required monitoring for the account, other services anticipated for the account, and the amount of work necessary to manage the account.

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

EnRich's security analysis methods include, but are not limited to, fundamental analysis (evaluating securities based upon its historical and projected financial performance).

EnRich and the EnRich Representatives use research material provided by third parties, including security analysts, non-affiliated investment management firms, economists, investment advisors, and rating services such as Morningstar. The representatives attend conferences and teleconferences with investment managers, and investment manager representatives.

Neither EnRich, nor the third-party managers it may secure, guarantee the results of the advice given. Thus, significant losses can occur by investing in any security, or by following any strategy, including conservative investments and strategies recommended or applied by EnRich.

Item 9 - Disciplinary Information

EnRich does not have any disciplinary information to report regarding itself or any of its counselors or other related persons.

Item 10 - Other Financial Industry Activities and Affiliations

Representatives and employees of EnRich may be licensed as insurance agents for various companies. Clients are under no obligation to purchase insurance through these "related persons;" however, if they choose to implement the recommendations, commissions may be earned in addition to any fees paid for advisory services. The commissions may be higher or lower than obtainable from other firms.

While providing the services described above, EnRich may seek the assistance of third party investment and financial planning consultants to evaluate portfolios and investments and to prepare reports going to the client. EnRich will pay a fee to the consultant for such assistance.

When EnRich Representatives make recommendations for the purchase of insurance, they also receive customary commissions as insurance representatives. The receipt of commissions in return for

insurance product purchases creates a conflict of interest for Representatives when they recommend the purchase of such products to clients.

Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Representatives of EnRich may buy or sell securities for themselves that they also recommend to clients. Where a transaction for a Representative, or an account related to a Representative, is contemplated, a client's transaction is given priority. EnRich has developed a Code of Ethics applicable to all persons who have access to confidential client records or to recommendations being made for client accounts. Designed to prevent conflicts of interest between the financial interests of clients and the interests of the firm's staff, the Code requires, among other procedures, such "access persons to obtain preapproval of certain securities transactions, to report transactions quarterly and to report all securities positions in which they have a beneficial interest at least annually. These reporting requirements allow supervisors at the firm to determine whether to allow or prohibit certain employee securities purchases and sales based on transactions made, or anticipated to be made, in the same securities for clients' accounts. The Code also established certain bookkeeping requirements relating to federal reporting rules. The Code is required to be reviewed annually and updated as necessary. A complete copy of the firm's Code is available upon request.

Item 12 - Brokerage Practices

When providing management services, EnRich participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. member FINRA/SIPC/NFA ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions.

Although it generally does not exercise discretion to select brokerage firms, EnRich recommends that clients use TD Ameritrade for custodial and transaction services. There is no direct link between EnRich's participation in the Program and the investment advice it gives to its clients, although EnRich receives economic benefits through its participation in the Program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk servicing advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to EnRich by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by EnRich's related persons and may also pay or reimburse expenses (including travel, lodging, meals and entertainment expenses) for EnRich's personnel to attend conferences or meetings relating to the program or to TD Ameritrade's advisor custody and brokerage services generally. Some of the products and services made available by TD Ameritrade through the Program may benefit EnRich but may not benefit its client accounts. These products or services may assist EnRich in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help EnRich manage and further develop its business enterprise. The benefits received by

EnRich through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. Clients should be aware, however, that the receipt of economic benefits by EnRich or its related persons in and of itself creates a potential conflict of interest and may indirectly influence EnRich's recommendation of TD Ameritrade for custody and brokerage services.

EnRich also receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment advisors participating in the Program. Specifically, the Additional Services include the annual fees for payment of the Morningstar Workstation and the Advent Axys. TD Ameritrade provides the Additional Services to EnRich in its sole discretion and at its own expense, and EnRich does not pay any fees to TD Ameritrade for the Additional Services. EnRich and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services.

EnRich's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to EnRich, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, EnRich's client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with EnRich, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, EnRich may have an incentive to recommend to its clients that the assets under management by EnRich be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. EnRich's receipt of Additional Services does not diminish its duty to act in the best interests of its clients, including to seek best execution of trades for client accounts.

The custodians recommended by EnRich, other than TD Ameritrade, may also, among other services, carry client accounts on their records, process transactions ordered by EnRich, provide computer access to EnRich for client positions and provide quotes and data needed by EnRich for its reports to clients. These services are provided to EnRich at minimal or no cost. EnRich believes that use of the recommended firm(s) is a convenient means of obtaining efficient transaction executions, account data and reporting services for securities positions. However, receipt of such services at minimal or no cost also creates an inducement and conflict of interest for EnRich since referring clients to any other firm(s) may result in higher reporting and overhead costs to EnRich. EnRich also on occasion provides advisory services to certain client investments that are unable to be custodied by TD Ameritrade but are required to be custodied by the vendor.

Clients should be aware the receipt of economic benefits by EnRich described above, in and of themselves, creates a potential conflict of interest and may directly or indirectly influence EnRich recommendation of those service providers for custody and brokerage service. Thus, the receipt of these services creates an incentive and conflict of interest for EnRich when it recommends TD Ameritrade services. Other than the services described above, EnRich and its Representatives do not direct transactions and the commissions they generate (soft dollars) to brokerage firms or other parties to receive research or other benefits.

Clients should be aware of the fact that not all advisers require clients to use a particular brokerage firm. Because clients having accounts managed by EnRich are required to open accounts with, and use the transaction services of, TD Ameritrade, EnRich may not be able to achieve the most favorable execution of client transactions. Thus, use of only TD Ameritrade may cost clients more money.

When exercising discretion, EnRich may combine orders for more than one client's account to form a "block" order for the purpose of seeking a better price and or execution. When a block order is executed, the broker/dealer executing the order typically allocates and average execution price to all shares in the block order, which EnRich then allocates to each customer's account position on a pro rata basis. Should a block order only be partially filled, available shares are distributed in a manner fair to all accounts.

Item 13 - Review of Accounts and Reports

EnRich Representatives review quarterly portfolio reports provided to clients on a quarterly basis, or more frequently if requested by a client. Each is a Certified Financial Planner Practitioner (CFP®).

EnRich Representatives provide each client with a review of the client's financial situation as frequently as they deem necessary. This review includes goals and assumptions, financial statements, cash flow and taxes, investments, retirement projections, insurance, and estate and general financial planning. Managed investment accounts are reviewed quarterly or more frequently as contributions and economic situations change.

All clients receiving Portfolio Management Services receive quarterly portfolio performance reports from EnRich which provide clients with: (1) Performance history, net of fees; (2) Portfolio composition - percentage weighting of each asset class; (3) Portfolio inception date with initial value; (4) Net additions/withdrawals; (5) Quarter end portfolio value; (6) Time weighted return and comparison rates of return of other standard indices; and (7) Listing of portfolio holdings.

A statement showing the market value of the securities in a client's account is sent monthly or quarterly by the investment company that holds the client's investments. EnRich prepares detailed quarterly reports showing objectives, asset allocation, and appraisals for managed investment accounts. Summaries are prepared at the request of financial planning clients.

Clients receiving consulting services receive reports in the frequency and scope specified the Services Agreement.

Item 14 - Client Referrals and Other Compensation

EnRich does not currently have any client referral relationships. Thus, it does not pay any fee to a third party for making client referrals to it.

EnRich may sponsor social events for clients, the expenses of which may be paid, in whole or part, by firms whose products and services are recommended to clients by EnRich portfolio managers. The firms absorbing such expenses may include mutual fund companies whose shares are recommended, attorneys whose services are recommended, brokerage firms through which client account transactions are processed, and other firms. These expense reimbursements may create a conflict of interest for EnRich and its managers because they would be inclined to continue to recommend the products and services of these providers due to the financial support provided to EnRich by them.

EnRich is listed on the website of Paladin Research & Registry, an online registry service used by investors to vet advisors and/or firms in their communities and learn more about them. Investors may also use Paladin's directory application to conduct their own searches for advisors and/or firms. In addition, investors have online access to documentation regarding our firm and the credentials, ethics, business practices, and financial services offered by our representatives. All professionals and firms listed on the registry pay various combinations of fixed and variable service fees, and receive referrals to

investors who use Paladin's matching and directory services. Paladian uses these fees to provide free information and services to investors. EnRich does not pay any fees to Paladin on a per-referral basis.

Item 15 - Custody

EnRich does not take or maintain custody of client funds or securities. These safekeeping services are typically provided to managed accounts only by the brokerage firm processing the securities transactions ordered by EnRich.

To the extent a client receives any account or other investment ownership statement from EnRich, EnRich recommends the client carefully compare the report to the custodian's statements.

Item 16 - Investment Discretion

When providing Portfolio Management Services, EnRich Representatives may exercise discretion when granted authority by clients. Most clients grant discretionary authority to EnRich, which allows EnRich to select the securities to buy and sell for the client's account, the amount to buy and sell, when to buy and sell, and the commission rate paid, without obtaining specific consent from the client for each trade. Clients should be aware that Representatives may make different recommendations and effect different trades with respect to the same securities and insurance to different advisory clients. Commissions and execution of securities transactions implemented through the custodian/broker dealer recommended by EnRich may not be better than the commissions or execution available if the client used another brokerage firm. However, EnRich believes the overall level of services and support provided to the client by custodians and broker dealers EnRich recommends outweighs the potentially lower costs, which may be available from other brokerage service providers.

According to the terms of certain service agreements, third-party managers used to manage client accounts or portions of client accounts may be hired or terminated by EnRich using discretionary authority granted to EnRich by a client. Such third-party managers also generally maintain discretionary authority granted by the client to purchase and sell securities at their discretion.

If a client directs EnRich to effect transactions through a particular broker/dealer, including TD Ameritrade, EnRich will do so. However, such an instruction may have implications to the client which could include incurring transaction costs and commissions that may be higher or lower than if the instruction had not been given. Also, restricting EnRich to particular broker/dealers may limit EnRich's ability to include a client account order within block orders to obtain the best price or execution. In addition, if EnRich is effecting transactions in a security for clients by means of a block order, as well as an order in the same security for a client who has directed EnRich to use a particular broker/dealer, EnRich will affect the block order immediately prior to affecting the directed brokerage trade. Thus, clients directing EnRich to use a particular broker/dealer may not receive the same average price for securities bought or sold that would be received if the order was part of a block order.

Clients should be aware that errors may occur when orders are processed by EnRich. When errors occur, it is EnRich's policy to absorb all losses for which EnRich is responsible and also to retain any gain, so that the error has no impact on the transaction or value of any Client's account.

Item 17 - Voting Client Securities

EnRich and its Representatives do not vote proxies on behalf of clients. The custodian of a client's account will forward all proxy requests directly to the client, without notice to EnRich, though it cannot

provide legal advice.

EnRich also does not take any action on legal notices it or a client may receive from issuers of securities held in a client's managed account. Any such notices are forwarded to the client. However, EnRich is available to answer questions regarding such notices.

Item 18 - Financial Information

EnRich does not receive fees of more than \$500 six months or more in advance. Thus, no financial statements are attached. EnRich does not have any financial condition that is reasonably likely to impair its ability to meet its contracted commitment to any client.

NOTICE REGARDING TREATMENT OF CONFIDENTIAL INFORMATION

Privacy Notice To Our Clients: EnRich Financial Partners strongly believes in protecting the confidentiality and security of information we collect about you. This notice describes our privacy policy and how we protect your personal information.

Why We Collect And How We Use Information: When we evaluate your request for our services, provide investment advice to you, and process transactions for your account, you typically provide us with certain personal information necessary for proper planning and transactions. We may also use that information to offer you other planning services to meet your investment and planning objectives.

What Information We Collect: The personal information we collect may include: 1. Name, address, phone numbers, e-mail addresses; 2. Social Security or taxpayer identification numbers; 3. Financial assets and net worth; 4. Income; 5. Account balances and positions, including accounts held at unaffiliated banks and other financial information; 6. Investment activity; 7. Information on accounts at other institutions, including, in some instances, login ID and password information for remote access to the same; and 8. Personal and/or family situation and objectives.

How We Protect Information: We do not sell or provide your personal information to anyone, other than what is required to establish accounts with TD Ameritrade or other financial service providers (i.e., insurance company, etc.). Information collected in connection with, or in anticipation of, any claim or legal proceedings will be shared with appropriate legal and professional outside advisors.

We treat information about current and former clients and their accounts in a confidential manner. Our employees may access information and provide it to third parties only when completing transactions or providing our other services to you. We generally restrict employee access to your information to those on a "need to know" basis, who require such information to perform services on your behalf.

At your request, we may disclose information to or from attorneys, accountants, securities firms, and others to assist us, or them, in providing services to you. We may also share information with companies that perform services on our behalf, such as the companies that we retain for marketing or administrative services. Companies we may retain to provide support services are not allowed to use your personal information for their own purposes. We may make additional disclosures as permitted by law.

We also maintain physical, electronic, and procedural safeguards to protect information. Employees and our professional service representatives are required to comply with our established information confidentiality provisions.

Access to And Correction of Information: Generally, upon your written request, we will make available information for your review. Information collected in connection with, or in anticipation of, any claim or legal proceeding will not be made available.

If your personal information with us becomes inaccurate, or if you need to make a change to that information, please contact us at the number shown below so we can update our records.